

ORIGINAL

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

VS.

Jacqueline Agnes CLAXTON,

Defendant,

MAGIS. NO. 10-296 LEK

CRIMINAL COMPLAINT

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 29 2010

at 9 o'clock and 40 min A.M.
SUE BEITIA, CLERK

CRIMINAL COMPLAINT

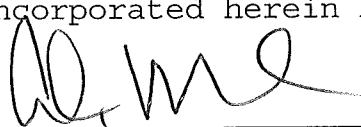
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about March 26, 2010 in Honolulu County, in the District of Hawaii, the above-named defendant knowingly and intentionally possessed with intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, to wit: approximately 3,592 grams of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a) (1), and 841(b) (1) (A).

I further state that I am a Task Force Officer with the Drug Enforcement Administration (DEA) and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint", which is incorporated herein by reference.

Sworn to before me and
subscribed in my presence,
this 28th day of March
2010, at Honolulu, Hawaii.


Alex Mendez, Task Force Officer
COMPLAINANT


LESLIE E. [Signature]
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Task Force Officer, Alex Mendez, after being duly sworn, deposes and states as follows:

1. I have been a Police Officer with the Honolulu Police Department (HPD) since December of 2001, and a Task Force Officer (TFO) with the United States Drug Enforcement Administration (DEA), Department of Justice, since November of 2007. As a Police Officer I have been a member of the Crime Reduction Unit (CRU), I have also been a Narcotics Officer with the Narcotics Vice Division. I attended the HPD Academy, located in Waipahu, Hawaii, during the period December 2001 - June 2002. In this school, students were taught, among other things, the different ways in which various controlled substances are used, as well as the different techniques generally utilized by drug traffickers to distribute and traffic controlled substances. During my time as a Narcotics Officer, I conservatively have been involved in more than forty drug investigations. In connection with said investigations, I have been involved in more than twenty searches of the residences of suspected drug traffickers. I am familiar with the typical manner in which various illegal drugs are used and the typical methods of distribution most often utilized by drug traffickers. I have personally conducted post-arrest interviews with numerous drug traffickers. During these interviews, drug traffickers explained to me their methods of operation, rational for activities that I have observed, and their personal insight into their drug trafficking enterprise. I am also familiar in the methods that these drug traffickers handle their drug related proceeds as well as their methods of hiding their drug related proceeds from law enforcement.

2. During this time, I have become knowledgeable with the enforcement of State and Federal laws pertaining to narcotics and dangerous drugs. Based on this experience, I have become well versed in the methodology utilized in narcotics trafficking operations, the specific types of language used by narcotic trafficking operations, the unique trafficking patterns employed by narcotics organizations and their patterns of drug abuse.

3. On the morning and early afternoon of 03/26/10 a cooperating defendant (CD) exchanged a series of text messages and made a consensually recorded call to/with Jacqueline Agnes CLAXTON to arrange for the purchase of four (4) pounds of crystal methamphetamine.

4. The CD stated that the negotiated price for the crystal methamphetamine, as in previous transactions with CLAXTON, was \$32,000 per pound.

5. During a series of exchanged text messages with the CD, CLAXTON agreed to meet the CD in the parking lot area of Nordstroms Rack, located at 330 Kamakee Street to sell the CD four (4) pounds of crystal methamphetamine.

6. Surveillance was established and maintained at all times on the CD and CLAXTON as they met in the vicinity of 330 Kamakee Street, Honolulu, Hawaii.

7. Surveillance observed the CD and CLAXTON walk through the parking lot area of 330 Kamakee Street and enter and sit in the undercover vehicle (UCV).

8. While in the UCV, the CD gave a pre-determined signal indicating that a transaction had occurred. Law enforcement then placed CLAXTON under arrest.

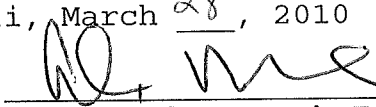
9. A search of the UCV was conducted after the arrest of CLAXTON and a total of approximately six (6) pounds of crystal methamphetamine was recovered.

10. After being placed under arrest CLAXTON gave verbal and written consent to a search of her hotel room #1501 at the Aqua Wave Hotel, located at 2299 Kuhio Avenue, Honolulu, Hawaii. A search of her room resulted in the recovery of drug ledgers and a seizure of \$34,000 recovered from the room safe.

11. CLAXTON was arrested for the charge set forth in this Complaint on March 26, 2010.

FURTHER AFFIANT SAYETH NAUGHT.

DATED: Honolulu, Hawaii, March 28th, 2010


Alex Mendez, Task Force Officer

This Criminal Complaint and Affidavit in support thereof were presented to, approved by, and probable cause to believe that defendant above-named committed the charged crime found to exist by the undersigned Judicial Officer at 7:55 a.m. on March 28, 2010 m

Subscribed and sworn to Before Me,
this 28th day of March 2010.


LESLIE E. KOBAYASHI
United States Magistrate Judge